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David J. Sheehan  
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Settlement Date: March 1, 2019  
Time: 12:00 p.m.  
  
Objections Due: February 28, 2019  
Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY PROCEEDINGS  
LISTED ON EXHIBIT A ATTACHED HERETO,

Defendants.

Adv. Pro. Nos. listed on Exhibit A  
Attached Hereto

**NOTICE OF SETTLEMENT OF ORDER IMPLEMENTING  
MEMORANDUM DECISION REGARDING TRUSTEE'S MOTION FOR  
ADDITIONAL DISCOVERY BASED ON THE DEPOSITION  
TESTIMONY OF BERNARD L. MADOFF**

**PLEASE TAKE NOTICE** that pursuant to Judge Bernstein's Memorandum Decision Regarding Trustee's Motion for Additional Discovery Based on the Deposition Testimony of Bernard L. Madoff (the "Decision"), and in accordance with Local Bankruptcy Rule 9074-1(a), the undersigned will present the proposed order, attached hereto as **Exhibit 1** (the "Proposed Order"), to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for settlement and signature in his chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **March 1, 2019 at 12:00 p.m.**

**PLEASE TAKE FURTHER NOTICE** that the Trustee provided the Proposed Order to counsel for defendants in the 16 adversary proceedings listed on **Exhibit A** attached hereto, but the Trustee has not received consent from all defendants for the filing of the attached Proposed Order. The remaining 72 good faith adversary proceedings subject to the Decision will be addressed in separate proposed orders.

**PLEASE TAKE FURTHER NOTICE** that to the extent there is a counter-proposed order or objection to the proposed order, it must be in writing and filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 by no later than **February 28, 2019 at 5:00 p.m.** (the "Objection Deadline"), with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein; and served upon Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington, D.C. 20006-1620, Attn: Kevin H. Bell, Esq. Any objection to the proposed order must specifically state the interest the objecting party has in these proceedings and the specific basis of any objection. Unless a

counter-proposed order or written objection to the proposed order is received before the objection deadline, the proposed order may be signed and entered by the Court without further notice.

Dated: New York, New York  
February 27, 2019

Respectfully Submitted,  
/s/ David J. Sheehan  
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Substantively Consolidated SIPA Liquidation of  
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and the Chapter 7 Estate of Bernard L. Madoff*